

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)	
)	
Amendment of Section 97.207(g))	
Of the Commission's Rules to)	RM-10621
Adjust Pre-Flight Notification)	
Deadlines Requirement)	
)	

COMMENTS OF STEPHEN MICHAEL KELLAT

On December 18, 2002, a Public Notice was issued concerning the petition captioned above. The petition comes before the Commission requesting a technical modification to a single section of the Commission's Rules. As an amateur radio operator duly licensed by the Commission, I am directly affected by this proposal made to the Commission and therefore do comment herein. The proposal is deregulatory in nature as it proposes to adjust a requirement that cannot be reasonably met any more due to changed conditions. Indeed, based upon petitioner's remarks, it appears appropriate that the requirement be modified to be reasonable and to take into account current conditions within the Amateur Radio Services.

As this proposal made by the Radio Amateur Satellite Corporation is deregulatory in nature and is narrowly defined, I suggest that the Commission issue an order on its own motion granting the request as presented. As this matter appears on its face to serve the interest of the Amateur Radio Services by adjusting a requirement that can no longer be reasonably met in today's satellite launcher market, a complete rulemaking proceeding does not appear necessary and that this matter could be dealt with most efficiently through the issuance of an order granting the proposed rule change. Petitioner remarks in

Petitioner's submission that waivers have been filed apparently routinely and have been granted routinely with respect to the regulation concerned thereby presenting reasoning that this would serve the interest of not only the Amateur Radio Services but also efficiency within the Commission in terms of workload. If it is not seen fit to grant an order as requested above, I support the issuance of a Notice of Proposed Rulemaking in the matter captioned above.

Respectfully Submitted,
/s/ Stephen Michael Kellat
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December 24, 2002